

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA WESTERN DIVISION

MICHAEL W. RONDINI, as)	
Administrator and Personal)	
Representative for the Estate of MEGAN)	
ELIZABETH RONDINI,)	
Deceased,)	
)	
Plaintiff,)	
)	
v.)	CASE NUMBER
)	7:17-CV-01114-RDI
)	
TERRY J. BUNN, JR.,)	
)	
)	
Defendant.)	

CONSENT MOTION TO EXTEND DEFENDANT'S DEADLINE TO REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO STRIKE

COMES NOW Terry J. Bunn, Jr. (hereinafter "Defendant") and moves this Court by consent motion to extend Defendant's deadline to reply to Plaintiff's Response to Defendant's Motion to Strike. In support thereof, Defendant states as follows:

I. RELEVANT BACKGROUND

- 1. On August 23, 2019, Defendant filed a Motion to Strike Plaintiff's Experts, Dr. Ziba Rezaee and Dr. Susan Arnold (Doc. 140).
- 2. On September 13, 2019, Plaintiff filed a Response to Defendant's Motion to Strike. (Doc. 144).
- On September 18, 2019, undersigned counsel for Defendant contacted counsel for Plaintiff, and requested consent to extend Defendant's reply deadline for its reply to Plaintiff's Response to Defendant's Motion to Strike.

4. On September 18, 2019, counsel for Plaintiff consented to Defendant's request to extend the

reply deadline for its reply to Plaintiff's Response to Defendant's Motion to Strike.

5. As such, Defendant respectfully brings this consent motion for an Order to extend the deadline

pursuant to the consensual agreement between the parties' counsel, and respectfully asks this

Court to extend Defendant's deadline to file a reply to Plaintiff's Response to Defendant's

Motion to Strike to Friday, September 20th.

II. CONCLUSION

WHEREFORE, premises considered, Defendant respectfully moves this Court to

GRANT the consent motion to extend Defendant's deadline to **Friday, September 20**th for filing

a reply brief to Plaintiff's Response to Defendant's Motion to Strike.

Respectfully submitted,

/s/ Richard E. Smith

Richard E. Smith (ASB-6536-M69R)

Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that I have this date, using the CM/ECF filing system which will send electronic notification of such filing, served a copy of the foregoing pleading upon all counsel of record:

Leroy Maxwell, Jr. MAXWELL LAW FIRM 2326 2nd Avenue North Birmingham, AL 35203

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/s/ Richard E. Smith
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